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5 Attorneys for Non-Parties  
6 SANDSTONE GROUP, LLC,  
TYTO LIDAR, LLC, and  
OGNEN STOJANOVSKI

8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**  
10 **SAN FRANCISCO DIVISION**

12 WAYMO LLC

Case No. 3:17-cv-00939-WHA

13 Plaintiff,

14 v.

15 UBER TECHNOLOGIES, INC.;  
16 OTTOMOTTO LLC; OTTO TRUCKING LLC

17 Defendants.

**DECLARATION OF ADRIAN J. SAWYER  
IN SUPPORT OF WAYMO LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL ITS MOTION TO  
COMPEL DEPOSITIONS, OVERRULE  
OBJECTIONS, COMPEL  
INTERROGATORIES, AND COMPEL  
SUPPLEMENTAL 30(B)(6) WITNESS  
(DKT. 1789)**

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1 I, Adrian J. Sawyer, hereby declare as follows:

2 1. I am an attorney licensed to practice before all courts of the State of California. I  
 3 am a partner in the law firm of Kerr & Wagstaffe LLP, attorneys for non-parties Sandstone  
 4 Group, LLC, Tyto LiDAR, LLC, and Ognen Stojanovski. I have personal knowledge of the  
 5 matters stated herein and if called upon would testify competently thereto.

6 2. I make this declaration in support of Plaintiff Waymo LLC's Administrative  
 7 Motion to File Under Seal Its Motion to Compel Depositions, Overrule Objections, Compel  
 8 Interrogatories, and Compel Supplemental 30(B)(6) Witness (Dkt. 1789). I have reviewed the  
 9 Administrative Motion to File Under Seal (the "Administrative Motion"), together with  
 10 Waymo's Motion to Compel Depositions, Overrule Objections, Compel Interrogatories, and  
 11 Compel Supplemental 30(B)(6) Witness ("Motion to Compel") (Dkt. 1789-10), and the exhibit  
 12 to the Motion to Compel sought to be filed under seal.

13 3. Tyto LiDAR is a non-party and are existing limited liability company. All of the  
 14 information designated by Tyto LiDAR and included in the Motion to Compel was designated  
 15 confidential. None of the information was designated highly confidential/AEO by Tyto LiDAR.

16 4. Exhibit 20 to the Motion to Compel is a Secondment Agreement between  
 17 Dogwood Leasing, LLC and Odin Wave, LLC, subsequently known as Tyto LiDAR. Exhibit 20  
 18 contains confidential proprietary and operational information of Tyto LiDAR, including  
 19 information related to development of its prototype LiDAR sensor and its management policies.  
 20 Because Tyto LiDAR is a non-party and existing private company, it requests that its  
 21 confidentiality interests in this information be respected in this proceeding.

22 5. Waymo's request to seal is narrowly tailored to those exhibits to Waymo's  
 23 Response that merit sealing.

24 I declare under penalty of perjury under the laws of the United States of America that the  
 25 foregoing is true and correct. Executed this 28th day of September, 2017 at San Francisco,  
 26 California.

27 /s/ Adrian J. Sawyer  
 28 ADRIAN J. SAWYER